

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

In re:)	
)	Bankruptcy Case
UNIMEX CORPORATION,)	No. 20-12535-BFK
)	Chapter 11
Debtor.)	
<hr style="width: 45%; margin-left: 0;"/>		
)	
JOLENE E. WEE, PLAN TRUSTEE OF)	
UNIMEX CORPORATION,)	
)	
Plaintiff,)	
)	
v.)	Adversary Proceeding No. 22-01058-BFK
)	
WEIWEI JIAN,)	
)	
Defendant.)	

PLAINTIFF'S DISCLOSURE OF TRIAL WITNESSES

Plaintiff, H Jolene E. Wee, Plan Trustee (the "Trustee" or "Plaintiff") for the bankruptcy estate of Unimex Corporation, by counsel, provides the following list of trial witnesses in accordance with the Order Setting Trial entered on September 12, 2023:

1. List of Witnesses Plaintiff may call at Trial if need arises.
 - A. Jolene E. Wee, Plan Trustee
Contact through counsel
 - B. Charles H. Stryker
Contact through counsel
 - C. Weiwei Jian
Defendant
 - D. Steven Ramsdell
Tyler, Bartl & Ramsdell, P.L.C.
300 N. Washington St., Suite 310
Alexandria, VA 22314
(703) 549-5003

E. Hagop Ouzounian
Falcon Path, L.L.C.
Contact through Counsel
David Spellman
1420 Fifth Avenue, Suite 3100
Seattle, WA 98101
(206) 319-7032
Email: dspellman@buchalter.com

2. Plaintiff reserves the right to call any additional witnesses identified or called by Defendant, and the right to call any additional witnesses as identified or as otherwise necessary as impeachment or rebuttal witnesses.

Respectfully submitted,

JOLENE E. WEE, PLAN TRUSTEE

By Counsel

NELSON MULLINS RILEY & SCARBOROUGH LLP
101 Constitution Avenue, NW, Suite 900
Washington, DC 20001
Telephone: (202) 689-2800
Facsimile: (202) 689-2860
Email: dylan.trache@nelsonmullins.com

By: /s/ Dylan G. Trache
Dylan G. Trache, Va. Bar No. 45939

Counsel to the Plan Trustee

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 8th day of December 2023, a copy of the foregoing was hand delivered to:

Maurice B. VerStandig, Esq.
THE BELMONT FIRM
1050 Connecticut Avenue, NW, Suite 500
Washington, DC 20036

/s/ Dylan G. Trache
Dylan G. Trache